



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, N.Y. 10007

ANDREA OSGOOD
Assistant Corporation Counsel
phone: (212) 356-2424
fax: (212) 356-3509
aosgood@law.nyc.gov

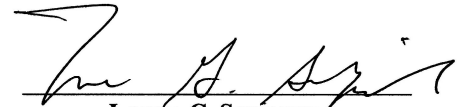
October 19, 2022

BY ECF

Hon. Lorna G. Schofield
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Application **GRANTED**. The conference regarding Plaintiff's motion to compel is **ADJOURNED** to November 9, 2022, at 4:10 p.m. The conference will be telephonic, at the following line: 888-363-4749; access code: 558-3333. The start time is approximate, but the parties shall be ready to begin at the scheduled time. So Ordered.

Dated: October 20, 2022
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: Abubalcarr Galbalbeh v. City of New York, et al., 22 Civ. 224 (LGS)

Your Honor:

I am an Assistant Corporation Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel for the City of New York ("City") assigned to the defense of the above-referenced matter. Defendant writes to respectfully request an adjournment of the discovery conference currently scheduled for October 26, 2022, at 4:10 p.m., until a date and time convenient to the Court after November 2, 2022. This is defendant's first request for an adjournment of the conference.

The reason for the requested adjournment is that the undersigned will be on trial in the matter of Vanessa Baez, et al. v. City of New York, et al., 16-CV-6340 (HG) (VMS) before the Honorable Hector Gonzalez in the Eastern District of New York from October 26 through approximately November 1, 2022. Plaintiff's counsel, Vik Pawar, objects to defendant's request, but, nevertheless has indicated that to the extent that the Court is inclined to grant an adjournment, plaintiff would consent to the conference occurring after the trial day in Baez is over.¹ For the Court's information, it is the undersigned's understanding that the jury will be sitting until 5:30 p.m. each day. Furthermore, at this time, it is unknown whether Judge Gonzalez will be addressing emerging trial issues at the end of each day. Thus, due to the lateness and/or uncertainty of the

¹ It is the undersigned's understanding that Mr. Pawar will be addressing defendant's request for an adjournment via a separate letter.

end time of trial each day, Mr. Pawar's suggestion to hold the conference at the end of the trial day is not feasible.

Based on the foregoing, defendant respectfully requests that the Court adjourn the discovery conference currently scheduled for October 26, 2022, until a date and time convenient to the Court after November 2, 2022. Thank you for your consideration herein.

Respectfully submitted,

/s/ *Andrea Osgood*

Andrea Osgood
Assistant Corporation Counsel

cc: All Counsel of Record (via ECF)